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ANDREA BEATTY RINKER  
Director

NE/SCB/MB  
FEB 25 1986  
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STATE OF WASHINGTON

DEPARTMENT OF ECOLOGY

4350 - 150th Ave NE • Redmond, Washington 98052-5301 • (206) 885-1444

February 24, 1986

Ash Grove Cement West, Inc.  
3801 East Marginal Way, S.  
Seattle, WA 98134

USEPA SF



1261160

Attn: Mr. Kenneth J. Rone, Jr.

Inspection Results and Recommendations

Dear Mr. Rone:

I wish to thank you for your cooperation during my inspection of your company on October 24, 1985 as well as the data you sent on November 1, 1985. I apologize for taking so long to get this letter out.

At the conclusion of my visit, I advised you that I would review the need for having the coal piles covered. I have reviewed the results of the EP Toxicity analysis conducted on the coal as well as the data in our files. Briefly, the problem with coal piles is that during dry weather, numerous oxidation products form and accumulate within the pile. The actual leachate from the pile during a storm will vary according pile configuration, degree of compaction, coal size, time since last storm flush etc. The control of this leachate is generally accomplished through the use of settling ponds, covered storage and incorporation of leachate into the product.

At present, your facility is the only one in this district which is not required to control leachate from coal. Because of the uncertainty of what is actually leaching from the pile, we are concerned about the contamination of ground water in the area and, due to the proximity of the pile to the Duwamish River, surface waters. Consequently, the coal pile be covered as long as it is on site. Further, we would ask that once the pile has been removed, that the soil under the pile be analyzed for: EP Toxicity for metals, including copper, nickel and zinc; pH; and sulfates. The soil should be tested to a depth of at least ten feet.

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Another area of concern is the slag pile. It has been the policy of this office to require that all piles of slag be covered to reduce leaching of metals to ground water. Thus, the slag pile should also be covered until it is removed from the site.

In regard to you settling pond, we would ask that you keep us advised of any plans for removal or modification since this will affect your current Waste Discharge Permit.

For your information, the Department of Ecology is preparing to institute application and processing fees for all permits. I have enclosed a copy of the proposed fee schedule. The assessments for permits will be retroactive to July 1, 1985.

If you have any questions or need further assistance, please contact me at 885-1900.

Sincerely,

Dan Cargill  
District Inspector  
Environmental Quality

DC:gm

Enclosure

cc: Tim Sample, METRO  
John Underwood, USEPA